

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA**

Criminal No. 1:25-cr-130

United States of America,

Plaintiff,

vs.

Wendi Renae Wells,

Defendant

**MOTION TO
CONTINUE**

Wendi Renae Wells's trial is scheduled for November 4, 2025 in Bismarck, North Dakota. Ms. Wells, through counsel, requests that the trial be continued for 90 days. The good cause for this request is detailed below:

- 1) Ms. Wells received discovery on September 26, 2025 and counsel needs time to review it and conduct any investigation based on it.
- 2) Counsel is located in Moorhead, Minnesota and the alleged incident occurred 338 miles away, in New Town, North Dakota. Counsel thus needs more time than normal to work through the case.
- 3) Ms. Wells is also charged in tribal court, and counsel would like to resolve the tribal matter before turning to the federal matter.
- 4) This is counsel's first continuance request.
- 5) The government, through Assistant United States Attorney Nick Baker, does not object to the request.

For these reasons, Wendi Renae Wells requests the Court: (1) continue her trial, and (2) schedule it on the first available date after February 1, 2026.

Date: September 27, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the beginning and a horizontal line extending to the right.

Dane DeKrey (#09524)
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